

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CRIMINAL NO. 15-30013-DRH
vs.)	
)	
MICHAEL J. KHOURY,)	
)	
Defendant.)	

STIPULATION OF FACTS

On January 19, 2015 at approximately 10:50 p.m., two individuals smashed the glass front door at Rural King at 2801 North Illinois in Swansea, Illinois, located within the Southern District of Illinois. Surveillance video showed that they immediately went towards a glass case holding numerous firearms of various makes and models, smashed the glass, loaded them into a bag, and then left the store. They left in a grey or silver four door vehicle. A Rural King employee provided the Swansea Police Department and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) with an inventory list of all firearms taken in the break in, including make and model information as well as serial numbers.

At approximately 11:24 p.m., a confidential informant (CI) working with a federal agency received a call from a guy he knew as "Mike" from the phone number (314) 324-8375. Mike said that he had something for the CI to look at and told him to come over to his residence in Cahokia, Illinois. When the CI arrived, Mike was there with another individual, who identified himself as "Murdock," adding he was Mike's brother-in-law.

Both Mike and Murdock showed the CI a black bag full of pistols and offered to sell them to the CI. They indicated that they had just broken into Rural King to steal the firearms.

The CI was provided a Smith & Wesson M&P 22 caliber firearm with serial number MP090563 with a promise to pay for the weapon at a later time.


Within hours, the CI provided this firearm to law enforcement investigating the break in. It was determined to be one of the firearms stolen during the Rural King break in. It was also determined that Michael Khoury lived at the address in Cahokia, Illinois where the CI went to make the purchase of the firearm. A photograph of Khoury was shown to the CI, and he positively identified Khoury as "Mike."

The firearm has traveled in or affected interstate or foreign commerce. The defendant has been convicted in an Illinois of a felony offense, specifically St. Clair County Case # 98-CF-93, the offense of Burglary, on April 28, 1998.

STEPHEN R. WIGGINTON
United States Attorney


MICHAEL J. KHOURY
Defendant


LAURA V. REPERT
Assistant United States Attorney


PHILLIP KAVANAUGH
Attorney for Defendant

Date: 5-12-15

Date: 5/12/15